

GORDON R. STOA
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IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF WASHINGTON

UNITED STATES OF AMERICA,)	
)	No. 2:19-CR-00008-SAB-3
Plaintiff,)	
)	MOTION FOR RECONSIDERATION
v.)	OF DETENTION
)	
SHAWNEE BIRDTAIL,)	
)	
)	February 19, 2019 @ 6:30 PM
Defendant.)	(Without Oral Argument)

MOTION

The Defendant, by and through her attorney, Gordon R. Stoa, moves this Court for an Order Reconsidering Detention as ordered on February 8, 2019 and filed February 11, 2019 (ECF 59). Specifically, the Defendant requests that she be released on her own recognizance pending the conclusion of this proceeding given the new information contained in the Supplemental Pre-Trial Services Report (ECF 69), the supportive recommendation of Pre-Trial Services, and the following Certification of Counsel.

CERTIFICATION OF COUNSEL

I, Gordon R. Stoa, attorney for the above named Defendant, certify that the following is true and accurate to the best of my knowledge and belief:

1. Pre-Trial Services is in support of release. The Government does not object to this request provided Pre-Trial Services is provided satisfactory evidence no guns are in the residence.
2. After speaking with Stephanie Cherney with Pre-Trial Services, the Defendant will undergo an intake with Pioneer treatment services as soon as possible to address any alcohol/drug issues and comply with any recommended treatment. This service will be paid for by the Government.
3. The Defendant will reside with family members upon release from detention.
4. The Defendant will continue her GED studies at Spokane Community College while this matter proceeds.

RESPECTFULLY SUBMITTED this 15th day of February 2019.

s/*Gordon R. Stoa WSB#27142*
Attorney for Shawnee Birdtail

I hereby certify that on the 15th day of February 2019, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF System which will send notification of such filing to the following parties:

Patrick Cashman
usawae.pcashmanecf@usdoj.gov

s/*Gordon R. Stoa WSB#27142*
Attorney for Shawnee Birdtail